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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 LAS VEGAS SANDS CORP., a Nevada
12 corporation,

13 Plaintiff,

14 v.

15 TRAFFIC LABEL LIMITED, a business
16 organization of the United Kingdom,

17 Defendant.
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Case No. 2:12-cv-01043-KJD -CWH

PRELIMINARY INJUNCTION

1 **UPON CONSIDERATION** of the motion filed by Plaintiff Las Vegas Sands Corp.
2 (“LVSC”) for an *ex parte* temporary restraining order, for alternative service, and for preliminary
3 injunction, the supporting memorandum of points and authorities, the supporting declarations
4 and evidence, the record in this case, and for other good cause shown;

5 **THE COURT HEREBY FINDS THAT:**

6 1. LVSC will suffer irreparable injury to its valuable trademarks and associated
7 goodwill if the Defendant is not preliminarily enjoined from transferring the
8 <lasvegassandscorp.com> domain name to other domain name registrars located outside the
9 Court’s jurisdiction, or from transferring its registration for the <lasvegassandscorp.com>
10 domain name to other persons or entities located outside the Court’s jurisdiction;

11 2. LVSC is likely to succeed on the merits of its claims for cybersquatting,
12 trademark infringement, and false designation of origin;

13 3. The balance of hardships tips in LVSC’s favor because a preliminary injunction
14 would merely place the <lasvegassandscorp.com> domain name on hold and lock pending trial,
15 and the failure to issue a preliminary injunction would cause LVSC to suffer additional
16 irreparable injury and incur additional expense if the <lasvegassandscorp.com> domain name is
17 transferred to other registrants during the pendency of this action, requiring LVSC to file
18 additional lawsuit(s) in other jurisdictions;

19 4. The issuance of a preliminary injunction is in the public interest because it would
20 protect consumers against deception and confusion arising from domain names containing the
21 Las Vegas Sands Corp. corporate name or LVSC’s trademarks, and from the use of the Las
22 Vegas Sands Corp. corporate name or LVSC’s trademarks, by persons other than LVSC; and

23 5. Defendant will suffer minimal damage, if any damage at all, by the issuance of a
24 preliminary injunction; accordingly, a nominal bond in the amount of \$100 is reasonable
25 security.

26 **THEREFORE, IT IS HEREBY ORDERED THAT**, pending a full trial on the merits:

27 1. The registration for the <lasvegassandscorp.com> domain name shall be
28 immediately transferred to LVSC; GoDaddy.com, Inc. (the domain name registrar) and/or

VeriSign, Inc. (the “.com” registry) shall, upon receiving notice of this preliminary injunction, change the registrar of record to a registrar selected by Plaintiff, who shall subsequently register the <lasvegassandscorp.com> domain name in the name of Plaintiff; the hold and lock placed on the domain name by the Court’s temporary restraining order shall remain in place after the domain name registration has been transferred to Plaintiff;

2. Defendant, including without limitation, all of its respective partners, officers, agents, servants, employees, and all other persons acting in concert or participation with Defendant, are hereby preliminarily enjoined from: (A) registering or trafficking in any domain name containing the Las Vegas Sands Corp. corporate name or the SANDS Marks or any confusingly similar variations thereof, alone or in combination with any other letters, words, phrases or designs; and (B) using the Las Vegas Sands Corp. corporate name or the SANDS Marks or any confusingly similar variations thereof, alone or in combination with any other letters, words, letter strings, phrases or designs in commerce (including, but not limited to, on any website or within any hidden text or metatags within any website); and

3. The \$100 cash deposit previously made by Plaintiff shall remain on deposit with the Clerk of the Court as security for this preliminary injunction pending the final disposition of this case.

ENTERED: this 2 day of July, 2012.



UNITED STATES DISTRICT JUDGE